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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARYLON BOYD, individually and as
Executor of the Estate of CAMMERIN BOYD,
deceased, ISABEL GONZALEZ, a minor by
and through her Guardian Ad Litem, Isela
Gonzalez, and KANANI BOYD, a minor by
and through her Guardian Ad Litem, Kamilah
Boyd,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,
HEATHER J. FONG, WILLIAM ELIEFF,
GREGORY KANE, JAMES O'MALLEY,
TIMOTHY PAINE, STEVEN STEARNS, and
DOES 1 to 10, inclusive,

Defendants.

Case No.: 04-5459 MMC

**JOINT STIPULATION TO CONTINUE
DISCOVERY CUTOFF, INITIAL
EXPERT AND REBUTTAL DISCLOSURE
DATES; [PROPOSED ORDER]**

1 *WHEREAS*, pursuant to the Court's scheduling order, discovery cut-off is presently
2 scheduled for January 15, 2007, with initial expert disclosure scheduled for January 29, 2007,
3 and rebuttal expert disclosure scheduled for February 12, 2007.
4

5 *WHEREAS*, the parties stipulate to a short continuance of discovery cut-off to
6 February 27, 2007, to complete pending depositions only (not for written discovery), and
7 continuance of expert disclosures and reports to March 22, 2007, and rebuttal expert
8 exchange to April 12, 2007.
9

10 *WHEREAS*, the parties have encountered difficulty getting some witnesses to appear at
11 depositions and there are pending depositions that have not taken place due to this problem
12 coupled with scheduling problems which the parties attempted to resolve but are unable to
13 accomplish prior to the present cutoff date. The pending depositions yet to be completed are
14 those depositions that were noticed prior to the present cutoff.
15
16

17 *WHEREAS*, the completion of the pending depositions is necessary prior to
18 completing expert disclosure as the experts will likely rely on the depositions yet to be
19 completed.
20

21 *WHEREAS*, the present dispositive motion cutoff will not be affected, and counsel for
22 defendants agree to file dispositive motions on March 15, 2007, and no earlier than this date.

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~~[PROPOSED]~~ ORDER

Discovery cut-off is continued to February 27, 2007. Initial expert disclosure and exchange of expert reports is continued to March 22, 2007, and rebuttal expert exchange is continued to April 12, 2007.

DATED: January 11, 2007



HONORABLE MAXINE CHESNEY